

From: [Kevin Shade](#)
To: [Barbara Nann](#)
Cc: [Dipanjana Bhattacharya](#); [Garyg Miller](#); [Susan Roddy](#)
Subject: Re: Fw: Tank Removal Action Field Activities Extension Request
Date: 01/27/2011 09:35 AM

I'm okay with the extension as well.

Gary has been trying to get in touch with Rita on whether it falls under the action memo or AOC. I also said I would look. Unfortunately, I have to meet a court ordered discovery deadline and cannot put any time into Gulfco for the remainder of the week.

Kevin

Kevin A. Shade
US EPA Region 6
Superfund Enforcement Officer
Phone: 214.665.2708
Fax: 214.665.6660

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▼ Barbara Nann---01/27/2011 09:22:37 AM---Where does the contaminated soils beneath the tanks fit in? Could that not have been part of the ta

From: Barbara Nann/R6/USEPA/US
To: Garyg Miller/R6/USEPA/US@EPA
Cc: Dipanjana Bhattacharya/R6/USEPA/US@EPA, Kevin Shade/R6/USEPA/US@EPA, Susan Roddy/R6/USEPA/US@EPA
Date: 01/27/2011 09:22 AM
Subject: Re: Fw: Tank Removal Action Field Activities Extension Request

Where does the contaminated soils beneath the tanks fit in? Could that not have been part of the tank removal?

Barbara A. Nann
Assistant Regional Counsel
EPA Region 6 (6RC-S)
1445 Ross Avenue
Dallas, TX 75202
phone: (214) 665-2157
fax: (214) 665-6460
nann.barbara@epa.gov



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▼ Garyg Miller---01/27/2011 09:10:27 AM---OK; the 30-day extension for field work won't affect the schedule because the removal report will st

From: Garyg Miller/R6/USEPA/US
To: Barbara Nann/R6/USEPA/US@EPA
Cc: Dipanjana Bhattacharya/R6/USEPA/US@EPA, Kevin Shade/R6/USEPA/US@EPA, Susan Roddy/R6/USEPA/US@EPA
Date: 01/27/2011 09:10 AM
Subject: Re: Fw: Tank Removal Action Field Activities Extension Request

OK; the 30-day extension for field work won't affect the schedule because the removal report will still be due on 2/26/11 (actually 2/28 because 2/26 is a Saturday).

Thanks,

Gary Miller, P.E.
Remediation Project Manager
EPA Region 6 - Superfund (6SF-RA)
(214) 665-8318
miller.garyg@epa.gov

▼ Barbara Nann---01/27/2011 08:57:31 AM---I am ok with granting the extension. Will it affect our schedule? Barbara A. Nann Assistant Regiona

From: Barbara Nann/R6/USEPA/US
To: Garyg Miller/R6/USEPA/US@EPA
Cc: Dipanjana Bhattacharya/R6/USEPA/US@EPA, Kevin Shade/R6/USEPA/US@EPA, Susan Roddy/R6/USEPA/US@EPA
Date: 01/27/2011 08:57 AM
Subject: Re: Fw: Tank Removal Action Field Activities Extension Request

I am ok with granting the extension. Will it affect our schedule?

Barbara A. Nann
Assistant Regional Counsel
EPA Region 6 (6RC-S)
1445 Ross Avenue
Dallas, TX 75202
phone: (214) 665-2157
fax: (214) 665-6460
nann.barbara@epa.gov

▼ Garyg Miller---01/26/2011 01:47:03 PM---Please look at this & lets discuss -

perhaps tomorrow if that works. Thanks.

From: Garyg Miller/R6/USEPA/US
To: Barbara Nann/R6/USEPA/US@EPA, Dipanjana Bhattacharya/R6/USEPA/US@EPA, Kevin Shade/R6/USEPA/US@EPA, Susan Roddy/R6/USEPA/US@EPA
Date: 01/26/2011 01:47 PM
Subject: Fw: Tank Removal Action Field Activities Extension Request

Please look at this & lets discuss - perhaps tomorrow if that works.

Thanks,

Gary Miller, P.E.
Remediation Project Manager
EPA Region 6 - Superfund (6SF-RA)
(214) 665-8318
miller.garyg@epa.gov

----- Forwarded by Garyg Miller/R6/USEPA/US on 01/26/2011 01:45 PM -----

From: "Eric Pastor" <eric.pastor@pbwllc.com>
To: Garyg Miller/R6/USEPA/US@EPA
Date: 01/26/2011 12:07 PM
Subject: Tank Removal Action Field Activities Extension Request

Hi Gary –

Per our previous discussions, I am sending this e-mail to request an extension to the schedule for completion of removal action field activities as provided in the Removal Action Work Plan in Appendix D of the Administrative Settlement Agreement and Order on Consent for Removal Action effective October 29, 2010. The Work Plan schedule provided for completion of removal action field activities within 90 calendar days of the effective date of the Settlement Agreement. Based on the Settlement Agreement effective date of October 29, 2010, this deadline for completion of field activities corresponds to January 27, 2011. As you know, all tank content removal, tank decontamination, tank demolition and containment area decontamination field activities have been completed. However, due to a temporary suspension in operations at the Clean Harbors incinerator used for disposal of hazardous solids generated during the removal action, nine roll-off boxes of hazardous solids (primarily excavated soils from the north containment area) can not be shipped from the Gulfco

site to the disposal facility until after the January 27, 2011 deadline. As I mentioned to you in a previous conversation, an alternative disposal facility is not available to accept this material within the specified time frame.

As a result of the disposal facility schedule, limited additional field activities, more specifically, the loading of the roll-offs onto trucks for off-site shipment, will be required beyond the January 27, 2011 deadline. In order to allow for completion of these loading activities, a 30-day extension (to February 26, 2011) is requested. Please note that we are not requesting an extension to the schedule for submittal of the Draft Tank Removal Report by February 26, 2011 (within 120 days of the effective date of the Settlement Agreement).

Please let me know if you have any questions or comments regarding this request.

Thanks.

Eric Pastor
Pastor, Behling & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, Texas 78664
512-671-3434